

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Fixed Wireless Communications Coalition,)	RM-11602
Petition to Amend Part 101 of the)	
Commission's Rules to Authorize 60 and 80)	
MHz Channels in Certain Bands for)	
Broadband Communications)	

To the Commission:

INITIAL COMMENTS OF CONTRERRA ULTRA BROADBAND, LLC

Conterra Ultra Broadband, LLC (“Conterra” or “Company”), acting with counsel and pursuant to Section 1.415(b) of the Federal Communications Commission’s (“FCC” or “Commission”) Rules, 47 C.F.R. § 1.415(b), hereby respectfully submits its initial comments on the captioned petition (“Petition”).¹

1. INTRODUCTION AND BACKGROUND – CONTRERRA’S INTERESTS

Conterra welcomes the opportunity to comment on the Petition. Conterra is a national, facilities-based, FCC common carrier providing high quality, high capacity backhaul and wide area telecommunications services for mobile carriers, school districts, health care providers and other select enterprises located in rural and exurban America. The Company primarily utilizes FCC Part 101 licensed microwave frequencies to augment and extend existing fiber optic

¹ These Initial Comments are timely filed in accordance with the Commission’s Public Notice, Report No. 2908, released June 4, 2010 and Section 1.4 of the Commission’s rules, 47 C.F.R. § 1.4.

backbones and rings in locations where the economics of deploying fixed-line media for middle and last-mile broadband connectivity are unfavorable.

2. CONTERRA IS CONCERNED ABOUT IMPACT ON CHANNEL AVAILABILITY

While Conterra is generally in agreement with the goals of increasing capacity of channels in the Part 101, 6 and 11 GHz bands, the Company is concerned with the effect that amending the Commission's rules as advocated by the Petition may have on the overall availability of channels for use in these bands.

Conterra is already facing difficulties coordinating channels in the Part 101, 6 and 11 GHz bands in States such as California, Virginia and Texas due to national carriers coordinating huge amounts of spectrum into single locations and narrow surrounding areas. The addition of "super channels" to the band plan will increase these difficulties and increase problems in delivering services to under- and unserved areas. Conterra feels that this initiative set forth in the Petition should not move forward unless there is a concurrent increase in available spectrum in these bands or a requirement to release unused allocations.

3. CONCLUSION

In conclusion, if "super channels" are something the FCC finds to be desirable, Conterra suggests they be created in a new spectrum allocation. To a large degree allowing creation of such channels in the existing band plan will simply negate the recent release of upper 6 GHz channels by nearly doubling the allowable single channel use of the current channel bandwidth.

Respectfully submitted,

CONTERRA ULTRA BROADBAND, LLC

By:  _____

Paul C. Besozzi
Patton Boggs LLP
2550 M Street, NW
Washington, D.C. 20037
(202) 457-5292

Counsel to Conterra Ultra Broadband, LLC

Angela Lee
General Counsel
Conterra Ultra Broadband, LLC
2101 Rexford Road
Suite 200 East
Charlotte, NC 28211
(704) 936-1806

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